

EXHIBIT 165

Rapid Response Team
July 15, 2008
Existing Client – Jeffrey Epstein (Follow-up Rapid Response Mtg.)

Private Banker – Mary Casey – 212 464-0374
Senior Manager – Marc Sheridan – 212 464-1321

Nature of Existing Relationship

The Epstein relationship, which includes accounts for his personal investment company – Financial Trust Company, mainly consists of banking and asset accounts with balances totaling approximately \$121.5 million. He has one open credit account with a -0- balance.

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Source of Wealth

Jeffrey Epstein is a money manager for wealthy individuals. Press articles indicate that he owns what is said to be the Manhattan's largest private house and runs his business from a 100 acre private island in St. Thomas.

Derogatory Information originally reported by Security Services (September, 2006)

The following derogatory information was identified by Security Services within related entity DDRs for Jeffrey Epstein:

- Several newspaper articles were found that detail the indictment of Jeffrey Epstein in Florida on felony charges of soliciting underage prostitutes.

Derogatory Information Update – July 2008

On July 3, 2008, Jeffrey Epstein was sentenced to 12 months in jail for solicitation of a prostitute and six months for procuring a person under age 18 for prostitution. His jail sentence will be followed by 12 months of house arrest.

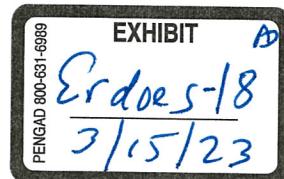
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Conclusion from 1st Rapid Response Meeting of 10/17/06

After internal discussions with Jes Staley, Mary Erdoes, Catherine Keating, John Duffy and Mary Casey, it was decided that we will keep Mr. Epstein solely as a banking client and on a 'reactive', client service basis. We will not proactively solicit new investment business from him.

Conclusion from follow-up Rapid Response of 7/15/08:

No change to relationship approach.



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